

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

**In re: VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION**

Civil Action No. 15-7658

JUDGE MICHAEL A. SHIPP
JUDGE LOIS H. GOODMAN

THIS DOCUMENT RELATES TO:

(ORAL ARGUMENT REQUESTED)

Motion Day: March 5, 2021

15-cv-07658 (MAS) (LHG)
16-cv-07321 (MAS) (LHG)
16-cv-07324 (MAS) (LHG)
16-cv-07494 (MAS) (LHG)
16-cv-07497 (MAS) (LHG)
17-cv-06513 (MAS) (LHG)
17-cv-07636 (MAS) (LHG)
17-cv-12088 (MAS) (LHG)
18-cv-00089 (MAS) (LHG)
18-cv-00343 (MAS) (LHG)
18-cv-00383 (MAS) (LHG)
18-cv-00846 (MAS) (LHG)
18-cv-00893 (MAS) (LHG)
18-cv-01223 (MAS) (LHG)
18-cv-08595 (MAS) (LHG)
18-cv-08705 (MAS) (LHG)
18-cv-15286 (MAS) (LHG)
20-cv-07460 (MAS) (LHG)
20-cv-07462 (MAS) (LHG)

**DECLARATION OF RICHARD HERNANDEZ IN SUPPORT OF
VALEANT'S MOTION FOR A PROTECTIVE ORDER TO PRECLUDE THE
DEPOSITION OF JOSEPH C. PAPA**

DECLARATION OF RICHARD HERNANDEZ

RICHARD HERNANDEZ hereby declares under penalty of perjury as follows:

1. I am a partner of the law firm McCarter & English, LLP, counsel to Valeant Pharmaceuticals International, Inc., n/k/a Bausch Health Companies Inc. (“Valeant”) in the above-referenced matter. I submit this Declaration in support of Valeant’s Memorandum of Law in Support of its Motion For a Protective Order to Preclude the Deposition of Joseph C. Papa.

2. Attached hereto are true and correct copies of the following:

February 7, 2021 email from Michael Hampson to Isaac Rethy re: Valeant Deposition Steering Committee	Exhibit A
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February 8, 2021 letter from Isaac Rethy to Michael Hampson re: Plaintiffs’ Request to Depose Joseph Papa	Exhibit B
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February 12, 2021 letter from Michael Hampson to Isaac Rethy re: Deposition of Joseph Papa	Exhibit C
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March 21, 2016 Valeant Press Release Titled “Valeant Announces CEO Succession Plan And Changes To Board Of Directors; Provides Accounting And Financial Reporting Update”	Exhibit D
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April 25, 2016 Valeant Press Release Titled “Valeant Names Joseph C. Papa To Be Chairman And Chief Executive Officer Of Valeant Pharmaceuticals”	Exhibit E
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May 3, 2016 Valeant Press Release Titled “Joseph C. Papa Assumes Role Of Chairman And Chief Executive Officer Of Valeant Pharmaceuticals”	Exhibit F
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Thomson Reuters Streetevents Edited Transcript VRX.TO – Valeant Pharmaceuticals International Inc at UBS Global Healthcare Conference	Exhibit G
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Transcript of Ari Herman’s March 2, 2021 Deposition (Day One) (excerpted)	Exhibit H
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Transcript of Ari Herman’s March 3, 2021 Deposition (Day Two) (excerpted)	Exhibit I
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I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Executed on March 5, 2021 in Newark, New Jersey.

/s/ Richard Hernandez
Richard Hernandez